

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JLM COUTURE, INC,

Plaintiff,

v.

HAYLEY PAIGE GUTMAN and CONRAD LOUIS
CLEVLEN,

Defendants.

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HAYLEY PAIGE GUTMAN,

Counterclaim-Plaintiff,

v.

JLM COUTURE, INC and JOSEPH L. MURPHY,

Counterclaim-Defendants.

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PLEASE TAKE NOTICE, that upon the annexed Declaration of Sarah M. Matz and the exhibits attached thereto, the Declaration of Joseph L. Murphy and the exhibits attached thereto, and the accompanying Memorandum of Law in support of the motion of Plaintiff/Counterclaim Defendant JLM Couture, Inc. (“JLM”), shall move this Court, before the Honorable Laura T. Swain at the United States District Court for the Southern District of New York, Courtroom 17 C, 500 Pearl Street, New York, New York, 10007, on a date and time to be directed by the Court, for an Order finding Defendant/Counterclaim-Plaintiff Hayley Paige Gutman (“Gutman”) in civil contempt of the Preliminary Injunction Order, dated March 4, 2021, [Dkt. No. 109] (“PI Order”), as modified by the Court’s June 2, 2021, Order (“6/2 Order”), pursuant to the Court’s inherent power to enforce compliance with its lawful orders, 18 U.S.C. § 401, Fed. R. Civ. P. 70, and Local Rule 83.6, for her willful violations of the PI Order and 6/2 Order, imposing both monetary and equitable

sanctions as requested in the accompanying Memorandum of Law on Gutman, awarding the JLM attorneys' fees, and for such other further relief as the Court deems just and proper. The reasons and grounds for this motion are more fully described in the accompanying Memorandum of Law in support of this motion. JLM has not previously made an application for the relief requested herein.

CERTIFICATION PURSUANT TO A(2)(b)(ii) of this Court's Individual Practices: JLM certifies that prior to making this motion, that it has used its best efforts to resolve informally the issues raised in this motion, which included sending counsel for Gutman a letter on June 18, 2021, regarding its motion for contempt and meeting and conferring with counsel for Gutman, pursuant to A(2)(b)(i) of this Court's Individual Practices, on June 23, 2021.

Dated: New York, New York
July 15, 2021

Respectfully submitted,
ADELMAN MATZ P.C.

By: 
Sarah M. Matz, Esq.
Gary Adelman, Esq.
1173A Second Avenue, Suite 153
New York, New York 10065
Tel: (646) 650-2207
Email: sarah@adelmanmatz.com
Email: g@adelmanmatz.com
Attorneys for JLM Couture, Inc.